



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY*"Better Service for a Better Environment"*

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RUSSELL J. HARDING, Director

REPLY TO

ENVIRONMENTAL RESPONSE DIVISION
KNAPPS CENTRE
PO BOX 30426
LANSING MI 48909-7926

July 21, 2000

Ms. Beth Reiner, RPM
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (MC HSRW-6J)
Chicago, Illinois 60604

Dear Ms. Reiner:

The Michigan Department of Environmental Quality (MDEQ), Environmental Response Division has reviewed the draft statutory 5-Year Review (Review) for the Hi-Mill Manufacturing Company (Hi-Mill) in Highland Township, Michigan. The MDEQ has the following observations and comments on the Review and request that our comments be made part of the Administrative Record for the Hi-Mill site.

General Observations on the 5-Year Review:

While most of the statements in the Review are accurate, the Review would be more informative if it contained sufficient site history to enable the reader to understand the significance of the findings and conclusions drawn in the Remedial Investigation/Feasibility Study (RI/FS), as a result of the four years of monitoring, and now, during the Review. For example, the Review simply states "The RI/FS reported that the intermediate aquifer showed no evidence of contamination." Historically, this is not the case. Just prior to the commencement of the RI/FS the Oakland County Health Department (OCHD) detected, and confirmed, volatile organic compounds (voc's) in the Hi-Mill production wells which are screened in the drinking water aquifer. Although no significant impact on the intermediate aquifer was observed during the RI, there have been documented impacts, and, further, there have been several detections in the drinking water aquifer since the detections by the OCHD. Specifically, Trichloroethylene (TCE) was detected once during the RI during vertical aquifer sampling, and twice during the long-term monitoring. Recall also that Hi-Mill maintained until the end of the RI that they did not have any idea what the source of the voc's could be. Since the RI was designed without the benefit of knowing the suspected source of the original voc's loss, it is possible that the RI missed the voc's in the drinking water aquifer. The Review should include the information that there were confirmed historic detections of voc's in the drinking water aquifer because the way the Review currently reads, the implication is that no impact has ever been seen on the intermediate/deep aquifer. This incorrectly leads the reader to conclude that contamination is and has been limited to the shallow groundwater.

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The Record of Decision (ROD) stipulated a no-action with long-term monitoring of the groundwater remedy. From the first round of quarterly sampling evidence has existed that the extent of TCE contamination may be greater than originally believed; or, that there is a new source of contamination present. The most contaminated well located on plant property during the RI had a maximum concentration of 6700 parts per billion (ppb) TCE. The concentration of TCE at this location two years later when the long-term monitoring commenced, had increased to as much as 210,000 ppb. The concentration has remained very high during the four years of monitoring being done at the site. This is indicative of a new source or sources of voc contamination since the time of the RI. Because we do not know the extent of the "new" contamination, the adequacy of the current monitoring system to detect migration cannot be determined. If migration pathways have not been defined, it is not possible to make the determination that the remedy is protective.

Specific Review Comments:

I. INTRODUCTION

A. Site History

Paragraph 1: Reference the comments above regarding the statement that the intermediate aquifer showed no evidence of contamination. Also, the last sentence states that sediment and surface water samples "revealed no significant impacts from site-related contamination." None of these samples were analyzed for organic compounds during the RI. Since the primary concern at the site is from contamination from organic compounds, this is a significant point and should be included in the text.

Paragraph 2: Item (2) states that there will be "long-term monitoring of nearby surface water bodies for voc's." Although the Review does eventually confirm that there is no active monitoring of surface water taking place, it would be appropriate to state that in this section as well.

Also in the second paragraph of the Site History, the Review correctly states that the state of Michigan did not concur with the ROD. However, a sentence of explanation as to why the state did not concur would be appropriate. The MDEQ suggests that the following be inserted into the text: The state's position was that the extent and fate of the contamination had not been adequately determined and that until it was, it was not possible to quantify the risks or potential risks posed by the contamination. Until the risks could be quantified, it was not possible to make an informed decision on the most appropriate remedy for the site that would be protective of human health and the environment.

Paragraph 3: The text should clarify that the institutional control implemented in 1994 is limited to the plant property. It does nothing to restrict exposure to contamination off plant property.

Paragraph 4: It was mentioned that Hi-Mill has retained a contractor and contacted the United States Environmental Protection Agency to propose a voluntary remedial action. Regardless of Hi-Mill's motivation to voluntarily propose remediation of the voc's at the site, this is an appropriate course of action given the high concentrations of voc's at the site and the lack of information on the extent of the contamination. Conducting an investigation to determine the extent of the voc's and possibly implement an active remedy at the site is a necessary and appropriate action to take and the 5-Year Review should include a statement of support by the agencies for this action. As drafted, the voluntary action is mentioned in the Review with no comment on the necessity of the assessment and remedial action, and the reader is left with the impression that the voluntary action is not really necessary.

II. SUMMARY OF SITE VISIT

Delete the last sentence in this section. Four years of monitoring data document that the concentration of TCE in the groundwater is significantly changed from the time of the ROD. In addition, the location of this TCE is not consistent with the conclusion drawn in the RI that the primary source of the TCE was the loss of 250 gallons of TCE on the opposite end of the plant. Therefore, it is not accurate to state that conditions are unchanged. The extent of the TCE present near SW1 is not known. However, the preliminary results of the soil gas survey suggest that the extent of this "new" TCE may be broader in scope than initially suspected. In order to confirm that no releases to surface water bodies may be occurring, or threaten, additional information is needed. For example, additional soil gas surveying may be necessary.

III. RECOMMENDATIONS

Paragraph 1: Hi-Mill has installed three wells at the site as part of the soil gas survey.

In the recommendations section, the MDEQ recommends that the Review clarify that, given the increase in concentration of voc's in groundwater since the time of the ROD, it is appropriate and necessary to investigate the origin and extent of this new contamination and to take appropriate action.

Paragraph 2: Approval to reduce the scope and/or frequency of the monitoring program should be deferred until the results of the extent of contamination study by Hi-Mill are available. At that time, depending upon the results of the study, it may be appropriate to reduce the monitoring program.

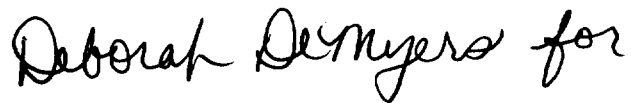
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IV. STATEMENT OF PROTECTIVENESS

The MDEQ does not feel that sufficient information about the extent of the voc's contamination is available to conclude that there is no migration occurring. Again, it could be stated that once Hi-Mill has determined the extent of the voc's contamination, a determination on the monitoring system's protectiveness can be made.

Please consider these comments and make revisions to the Review as appropriate. As requested above, please place these comments in the Hi-Mill Administrative Record.

Sincerely,

A handwritten signature in cursive script that reads "Deborah Larsen for".

Deborah Larsen
Senior Project Manager
Superfund Section
Environmental Response Division
517-373-4825

cc: Ms. Claudia Kerbawy, MDEQ
Mr. Mitch Adelman, MDEQ/Hi-Mill site file
Mr. Jim Heinzman, MDEQ
Mr. William Bolio, MDEQ